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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Compañía del Bajo Caroni (Caromin), C.A., and)
V.M.C. Mining Company, C.A.,)

Plaintiffs,)

v.)

Bolivarian Republic of Venezuela and)
Ministry of Basic Industries and Mines,)

Defendants.)

Case No. 07-CV-3179 (NRB)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth S. Leonetti, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

GERALDINE R. FISCHER
Foley Hoag, LLP
1875 K Street, N.W.
Washington, D.C. 20006
Telephone: (202) 223-1200
Facsimile: (202) 785-6687
Email: Gfischer@foleyhoag.com

To the best of my knowledge, information and belief, Mrs. Fischer is a member in good standing of the Bar of the State of New York and of Washington, D.C., and there are no pending disciplinary proceedings against her in any State or Federal Court.

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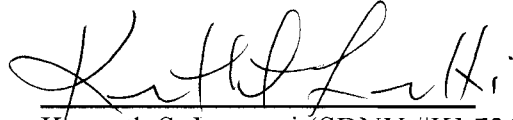
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WHEREFORE, it is respectfully requested that the Court grant the motion to admit Geraldine R. Fischer pro hac vice, to represent Defendants in this matter.

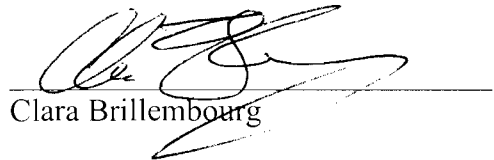
Dated: August 20, 2007
Boston, Massachusetts


Kenneth S. Leonetti (SDNY #KL7368)
FOLEY HOAG LLP
155 Seaport Boulevard
Boston, Massachusetts 02210
Phone (617) 832-1000
Fax (617) 832-7000

Attorney for Defendants

CERTIFICATE OF SERVICE

I, Clara Brillembourg, hereby certify that on August 23, 2007, I caused a true copy of the foregoing document to be served upon all parties by Federal Express.


Clara Brillembourg

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Compañia del Bajo Caroni (Caromin), C.A., and
V.M.C. Mining Company, C.A.,

Plaintiffs,

v.

Bolivarian Republic of Venezuela and
Ministry of Basic Industries and Mines,

Defendants.

Case No. 07-CV-3179 (NRB)

STATE OF MASSACHUSETTS)

) ss:

COUNTY OF SUFFOLK)

**AFFIDAVIT OF KENNETH S. LEONETTI IN SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC VICE**

Kenneth S. Leonetti, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the firm of Foley Hoag LLP, counsel to Defendants in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Geraldine R. Fischer as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law there in 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Geraldine R. Fischer since May 2007.

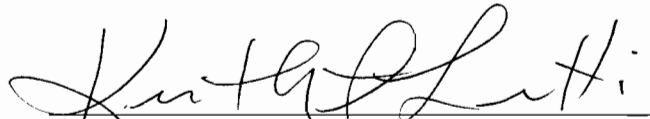
4. Mrs. Fischer is an associate at Foley Hoag LLP, resident in the firm's Washington D.C. office.

5. I have found Mrs. Fischer to be a skilled attorney and a person of integrity.

To the best of my knowledge and information, she is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move for the admission of Geraldine R. Fischer, pro hac vice.

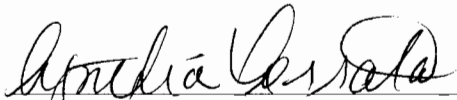
7. I respectfully submit a proposed order granting the admission of Geraldine R. Fischer pro hac vice, which is attached hereto.



Kenneth S. Leonetti (SDNY # KL-7368)
FOLEY HOAG LLP
Seaport World Trade Center West
155 Seaport Boulevard
Boston, Massachusetts 02210
(617) 832-1000
e-mail: kleonetti@foleyhoag.com

Counsel for Defendants

Sworn to before me this
20th day of August, 2007



Notary Public

My commission expires: 3/30/12



CYNTHIA PORRATA
Notary Public
Commonwealth of Massachusetts
My Commission Expires
March 30, 2012

received
8/27/07

CERTIFICATE OF SERVICE

I, Clara Brillembourg, hereby certify that on August 23, 2007, I caused a true copy of the foregoing document to be served upon all parties by Federal Express.


Clara Brillembourg



State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Geraldine Rebeca Fischer

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 29th day of January, 2003, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 20th day of August, 2007.



Michael J. Novack

Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

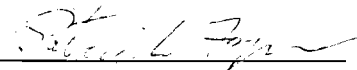
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

GERALDINE R. FISCHER

was on the 14TH day of NOVEMBER, 2005
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on August
17, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Compañía del Bajo Caroni (Caromin), C.A., and)
V.M.C. Mining Company, C.A.,)
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Plaintiffs,)
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v.)
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Bolivarian Republic of Venezuela and)
Ministry of Basic Industries and Mines,)
)
Defendants.)
)

Case No. 07-CV-3179 (NRB)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Kenneth S. Leonetti, attorney for Defendants, the Bolivarian Republic of Venezuela and the Ministry of Basic Industries and Mines, in the above-captioned case and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Geraldine R. Fischer
Firm Name: Foley Hoag LLP
Address: 1875 18th Street, NW
City/State/Zip: Washington, DC 20006
Phone Number: 202-223-1200
Fax: 202-785-6687
E-mail: gfischer@foleyhoag.com

is admitted to practice pro hac vice as counsel for Defendants the Bolivarian Republic of Venezuela and the Ministry of Basic Industries and Mines in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District Judge